

Judge Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

FIVE (5) VERIZON WIRELESS CARDS
VALUED AT \$500.00 IN U.S. CURRENCY, and
NINETEEN (19) AMEX BUSINESS GIFT
CARDS VALUED AT \$39,052.06 IN U.S.
CURRENCY,

Defendants.

No. 2:16-CV-373-RSL

**STIPULATED SETTLEMENT
AGREEMENT**

IT IS HEREBY STIPULATED between the United States, by and through its undersigned counsel, and *pro se* Claimant Maziar Rezakhani ("Claimant") to compromise and settle Claimant's claim of interest to the following property:

- a. \$500.00 in U.S. Currency; and
 - b. Nineteen (19) Amex Business Gift Cards Valued at \$39,052.06 in U.S. Currency, seized from Maziar Rezakhani, at 688 110th Avenue, NE, Unit #S-3301, Bellevue, Washington.
- (hereinafter referred to as "defendant property.") Pursuant to the following terms:

SETTLEMENT AGREEMENT
U.S. v. Five (5) Verizon Wireless cards, et al.
Case No. 3:16-CV-373-RSL

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UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5200
SEATTLE, WASHINGTON 98101
(206) 553-7970

- 1 1. Claimant stipulates and agrees that the above listed defendant property constitutes
2 proceeds of bank fraud, in violation of 18 U.S.C. § 1344, and thus is subject to
3 forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).
- 4 2. Accordingly, Claimant hereby agrees to withdraw his claim and waive any interest
5 he may have in the defendant property.
- 6 3. Claimant agrees to release and hold harmless the United States, the United States
7 Department of Justice, the United States Department of Treasury, and any and all
8 agents, servants, and employees of the United States and its agencies, acting in
9 their individual or official capacities, from any and all claims by Claimant and/or
10 his representatives, agents, heirs, successors, and assigns, which currently exist or
11 which may arise as a result of the search and seizure of the defendant property,
12 and/or forfeiture action involving the defendant property.
- 13 4. Claimant agrees that this Agreement shall constitute full settlement and
14 satisfaction of any and all claims by Claimant to the defendant property resulting
15 from the incidents or circumstances giving rise to this action.
- 16 5. Each party to this Agreement agrees to bear its own costs and attorney's fees.

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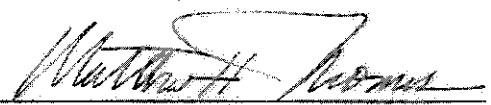
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1 6. The terms of this Agreement shall be subject to approval by the United States
2 District Court for the Western District of Washington, and the Court shall retain
3 such jurisdiction to enforce those terms.
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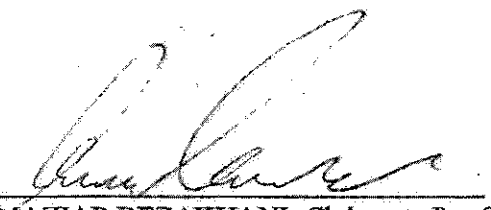
5 Respectfully Submitted,

6 ANNETTE L. HAYES
7 United States Attorney

8
9 DATED: 21 August 2017


10 MATTHEW H. THOMAS
11 Assistant United States Attorney
12 United States Attorney's Office
13 1201 Pacific Avenue, Suite 700
14 Tacoma, Washington 98402-4383
15 Telephone: (253) 428-3800
16 Fax: (253) 428-3826

17 DATED: 8/20/17


18 MAZIAR REZAKHANI, Claimant, Pro Se
19 45308-086
20 Seatac-Federal Detention Center Inmate
21 Mail/Parcels
22 P.O. Box 13900
23 Seattle, WA 98198
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ORDER

Based upon the foregoing stipulation of the parties, this Stipulated Settlement Agreement is hereby APPROVED.

DATED this 24th day of AUG., 2017.



ROBERT S. LASNIK
UNITED STATES DISTRICT JUDGE